



DEPARTMENT OF NATURAL RESOURCES

Bob Holden Co. mior Stephen M. Mahfood Director

4717
Site Herculaneum Road
ID # MD006 246373
Break 2.0
Other 6-24-02

June 24, 2002

RECEIVED

JUN 28 2002

SUPERFUND

Mr. Bruce Morrison
U.S. Environmental Protection Agency
901 N. 5th St.
Kansas City, KS 66101

Dear Mr. Morrison:

I have reviewed The Doe Run Company's June 2002 Amended Smelter Transportation and Materials Handling Plan. In general, the fourth draft of the plan has addressed the Department of Natural Resources' concerns related to fugitive dust and tracking from the facility.

The following are the my specific comments on the subject document:

1. In the cover letter under EPA Comment #2, the text indicates that above freezing conditions trucks can be washed outside of the enclosed truck wash. Doe Run should clarify that this will occur only if the enclosed truck wash is temporarily inoperable.
2. Page 21, Section 3.1.5.4, Vehicle Decontamination in Freezing Conditions, the description of dry cleaning in freezing weather if the enclosed truck wash is inoperable is inconsistent with earlier discussion. The department does not agree that dry cleaning described in this section is an adequate backup to the heated truck wash.
3. Page 24, Section 3.2, Mines- Outbound Lead Concentrate, a plan for cleaning outbound trucks from Doe Run's SEMO mills is critical to the success of efforts in Herculaneum. During the original negotiations on the state's settlement agreement, Doe Run committed to a certain date for submittal of this plan (I believe October 2002). Doe Run needs to state a deadline for submittal of this plan in this section.
4. Page 25, Section 3.3.2.1, Dry Street Sweeping, second paragraph, Doe Run needs to include criteria for making a decision on sealing haul roads. The department maintains our position that the criteria for sealing haul roads should be a comparison to non-haul road concentrations in Herculaneum.
5. Appendix F, Street Sampling Protocol, data from street samples should also be presented in mg/kg. This will allow the agencies to compare the data with risk derived values.

I will be out of the office until July 8, 2002. If you have any questions related to these comments, you may contact Gary Behms or Jalal El-Jayyousi at (573) 751-8629.

Sincerely,

David E. Mosby, RG
Project Manager

DEM:kc

c Jim Lanzafame, Doe Run
Tony Petruska, EPA
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